

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE No. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**ELEVENTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
DECEMBER 1, 2023 TO DECEMBER 31, 2023**

<b>Name of Applicant:</b>	Jordan & Ortiz, P.C. (“J&O”)	
<b>Applicant’s Role in Case:</b>	Co-Counsel to Debtor	
<b>Date Order of Appointment Signed:</b>	January 20, 2023 (Dkt #105)	
	<b>Beginning of Period</b>	<b>End of Period</b>
<b>Time Period Covered in Statement:</b>	12/01/2023	12/31/2023
<b>Summary of Total Fees and Expenses Requested</b>		
<b>Total Fees Requested in this Statement:</b>		\$4,532.00 (80% of \$5,665.00)
<b>Total Reimbursable Expenses Requested in this Statement:</b>		\$14.15 <sup>1</sup>
<b>Summary Attorney Fees for the Period Covered by this Statement</b>		
<b>Attorneys Fees in this Statement:</b>		\$4,440.00
<b>Total Actual Attorneys Hours Covered by this Statement:</b>		7.40
<b>Average Hourly Rate for Attorneys:</b>		\$600.00
<b>Summary Paraprofessional Fees for the Period Covered by this Statement</b>		
<b>Paraprofessional Fees Requested in this Statement:</b>		\$1,225.00
<b>Total Actual Paraprofessional Hours Covered by this Statement:</b>		4.90
<b>Average Hourly Rate for Paraprofessionals:</b>		\$250.00

<sup>1</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

### **RELIEF REQUESTED**

1. This is Jordan & Ortiz, P.C.'s ("J&O") ninth monthly fee statement for compensation (the "Fee Statement") for the period of December 1, 2023 through December 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its eleventh monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$4,532.00 (80% of \$5,665.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$14.15 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

### **SERVICES RENDERED AND DISBURSEMENTS INCURRED**

2. Attached as Exhibit "A" is the Fee Statement for the period December 1, 2023 through December 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each

category, including description, incurred with the amounts for which reimbursement is requested. Exhibit “A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). The Second Interim Application for fees and expenses from May 16, 2023 through November 30, 2023 (Docket #527) and Ordered to be paid (Docket #546). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

### NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to

make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$4,532.00 (80% of fees in the amount of \$5,665.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$14.15 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$4,546.15 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: January 17, 2024

/s/ Shelby A. Jordan  
SHELBY A. JORDAN  
State Bar No. 11016700  
S.D. No. 2195  
ANTONIO ORTIZ  
State Bar No. 24074839  
S.D. No. 1127322  
***Jordan & Ortiz, P.C.***  
500 North Shoreline Blvd., Suite 804  
Corpus Christi, TX 78401  
Telephone: (361) 884-5678  
Facsimile: (361) 888-5555  
Email: [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)  
[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)  
Copy to: [cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)  
**CO-COUNSEL FOR DEBTOR**

### CERTIFICATE OF SERVICE

I certify that on January 17, 2024, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

**EXHIBIT “A”**

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD  
DECEMBER 1, 2023 TO DECEMBER 31, 2023**

JORDAN & CRITZ, P.C.  
 500 N. SHORELINE BLVD, SUITE 804  
 CORPUS CHRISTI, TEXAS 78401-0341  
 TAX ID NO. 74-2553880  
 (361) 884-5678

JONES, ALEX  
 alexejones1777@gmail.com

Page: 1  
 January 09, 2024  
 Account No: 5481-002000M  
 Statement No: 922899

## Bankruptcy

PREVIOUS BALANCE					\$100,029.25	
					Hours	
12/01/2023	SAJ	B110	A107	Email Bob Schliezer regarding all fees accounting previously furnished and request need for update or further information.	0.40	240.00
	SAJ	B320	A104	Review agreed schedule for Plan confirmation hearings and calendar along with dates for objection.	1.00	600.00
12/05/2023	SAJ	B110	A107	Conference with Battaglia and discuss case status and status of missing bank deposit check.	0.50	300.00
12/11/2023	SAJ	B160	A103	Work on second fee application draft.	1.00	600.00
12/12/2023	CRM	B160	A103	Work on 2nd Interim Fee Application.	0.70	175.00
	CRM	B160	A103	Prepare 10th Monthly Fee Notice and file and serve same.	2.90	725.00
	SAJ	B110	A107	Email to co-counsel for status.	0.20	120.00
	SAJ	B110	A106	Call to client regarding internet coverage by Tucker Carlson and admission to X (twitter) and caution on posts.	0.40	240.00
	SAJ	B160	A103	Begin review of time for 2nd application.	0.30	180.00
12/13/2023	SAJ	B110	A107	Telephone conference with co-counsel regarding plan and terms and agreement that \$1.5B claims may by agreement become become non-dischargeable and appeal dropped.	1.40	840.00
	SAJ	B320	A104	Begin review of Plan and Plan terms and telephone call to client.	0.50	300.00
12/14/2023	SAJ	B110	A107	Status report call to co-counsel.	0.20	120.00
	SAJ	B320	A104	Work on review of plan.	0.70	420.00
12/15/2023	SAJ	B320	A104	Continue to review plan and make comments.	0.80	480.00
12/19/2023	CRM	B160	A103	Review and revise Shelby Jordan revisions to 2nd Interim Fee		



JONES, ALEX

January 09, 2024

Account No: 5481-002000M  
Statement No: 922899

Bankruptcy

Application and file and serve same.	Hours	
	1.30	325.00
For Current Services Rendered	12.30	5,665.00

Recapitulation		Hours	Rate	Total
Timekeeper	Title			
SHELBY A. JORDAN	Partners	7.40	\$600.00	\$4,440.00
CHRYSTAL MADDEN	Paralegals	4.90	250.00	1,225.00

12/31/2023	B110	E106	Lexis	14.15
			Total Expenses	14.15
			Total Current Work	5,679.15
			Total Payments	-38,257.26
			Balance Due	<u>\$67,451.14</u>

Task Code Summary

		Fees	Expenses
B110	Case Administration	1860.00	14.15
B160	Fee/Employment Applications	2005.00	0.00
B100	Administration	3,865.00	14.15
B320	Plan and Discosure Statement (including Business Plan)	1800.00	0.00
B300	Claims and Plan	1,800.00	0.00

\*The entry N/C signifies time spent for which there will be no charge.\*

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED  
TO BE PAID UNDER DOCKET #346 and #546<sup>2</sup>**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Interim Amount Applied Per #346</u>	<u>Remaining Balance Due</u>
<b>First Fee Application</b>								
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50	\$0.00
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00	\$0.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00	\$0.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73	\$0.00
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00	\$0.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70	\$0.00
		<b>TOTALS</b>	<b>\$243,622.50</b>	<b>\$1,067.59</b>	<b>\$244,690.09</b>	<b>-\$146,790.16</b>	<b>\$97,899.93</b>	<b>\$0.00</b>

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Interim Amount Applied Per #546</u>	<u>Remaining Balance Due</u>
<b>Second Fee Application</b>								
922462	May 16-31	6/8/23	\$9,925.00	\$189.09	\$10,114.09	\$0.00		\$10,114.09
922517	June	7/11/23	\$9,420.00	\$14.30	\$9,434.30	\$0.00		\$9,434.30
922607	July	8/3/23	\$5,455.00	\$0.00	\$5,455.00	\$0.00		\$5,455.00
922637	August	9/7/23	\$4,535.00	\$32.50	\$4,567.50	\$0.00		\$4,567.50
922703	September	10/4/23	\$15,860.00	\$16.10	\$15,876.10	\$0.00		\$15,876.10
922768	October	11/6/23	\$9,895.00	\$0.00	\$9,895.00	\$0.00		\$9,895.00
922835	November	12/6/23	\$6,365.00	\$65.00	\$6,430.00	\$0.00		\$6,430.00
		<b>TOTALS</b>	<b>\$61,455.00</b>	<b>\$316.99</b>	<b>\$61,771.99</b>	<b>\$0.00</b>		<b>\$61,771.99</b>

<sup>2</sup> Order Granting First Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from December 2, 2022 through May 15, 2023 (#346) and Order Granting Second Interim Application of Jordan & Ortiz, P.C. for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred for the Period from May 16, 2023 through November 30, 2023 (#546).

**EXHIBIT “B”****TASK CODES**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	3.10	
B120 Asset Analysis and Recovery		
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications	1.3	4.9
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters		
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement	3.0	
B410 General Bankruptcy Advice/Opinions		
B420 Restructurings		
<b>TOTALS:</b>	<b>7.40</b>	<b>4.9</b>